

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

STATE OF LOUISIANA,	*	CIVIL ACTION NO. 3:23-cv-00302-
	*	BAJ-SDJ
	*	
Plaintiff,	*	
	*	
versus	*	JUDGE: BRIAN A. JACKSON
	*	
	*	
SANOFI-AVENTIS U.S. LLC, et al.	*	MAGISTRATE JUDGE: SCOTT D.
	*	JOHNSON
	*	
Defendants	*	
	*	
	*	

CONSENT MOTION FOR EXTENSION OF TIME

NOW INTO COURT, through undersigned counsel, come defendants CaremarkPCS Health, L.L.C. and CVS Health Corp. who, with the consent of all parties, move this Court for an extension of time and to postpone the deadlines set forth in the Court's Order (Doc. No. 17) pending resolution of the outstanding Motion to Remand filed by Plaintiff (Doc. No. 24) upon representing as follows:

1. On May 2, 2023, the Court issued an Order requiring the parties to (1) hold a Rule 26(f) conference by July 13, 2023; (2) file a joint status report by July 20, 2023; and (3) make their Rule 26 initial disclosures by July 27, 2023. The Order further set a telephone scheduling conference to be held on August 3, 2023, at 4:00 p.m. *See* Doc. No. 17.
2. On May 17, 2023, the Court granted the Consent Motion for Extension filed by Defendant, Sanofi-Aventis U.S. LLC, and issued an order extending the deadline for all Defendants to file responsive pleadings until 14 days after the Court's resolution of Plaintiff's Motion to Remand. Doc. No. 23.
3. Because the Defendants' responsive pleadings are not due until 14 days after the Court's resolution of Plaintiff's Motion to Remand, the parties respectfully submit that

there is good cause to likewise defer a joint status report, initial disclosures, and a scheduling conference until after the Court has ruled on Plaintiff's Motion to Remand.

The parties further submit that under Rule 16(b)(2) there is good cause for the Court to delay issuing a Scheduling Order until after the Court has ruled on Plaintiff's Motion to Remand.

4. CaremarkPCS Health, L.L.C. and CVS Health Corp. certify that Plaintiff and all Defendants in the above captioned matter have consented to the requested extensions.

WHEREFORE, CaremarkPCS Health, L.L.C. and CVS Health Corp., with the consent of all parties, move the Court to enter the Order submitted herewith extending the deadlines and scheduled conferences set forth in the Court's Order (Doc. No. 17) pending the resolution of the Motion to Remand filed by Plaintiff (*see* Doc. No. 24).

This 13th day of July, 2023

Respectfully submitted,

/s/ James A. Brown

James A. Brown (Bar # 14101)
Melanie Derefinko (Bar # 37658)
Courtney Harper Turkington (Bar # 38255)
LISKOW & LEWIS
701 Poydras Street, Suite 5000
New Orleans, Louisiana 70139-5099
Telephone: (504) 581-7979
Facsimile: (504) 556-4108
jabrown@liskow.com
mderefinko@liskow.com
chturkington@liskow.com

Enu Mainigi (*pro hac vice*)
Craig Singer (*pro hac vice*)
R. Kennon Poteat III (*pro hac vice*)
A. Joshua Podoll (*pro hac vice*)
Alexander Gazikas (*pro hac vice*)
WILLIAMS AND CONNOLLY LLP
680 Maine Avenue S.W. Washington, DC 20024
Tel: (202) 434-5000

Fax: (202) 434-5029
emainigi@wc.com
csinger@wc.com
kpoteat@wc.com
apodoll@wc.com
agazikas@wc.com

*Attorneys for CaremarkPCS Health, L.L.C. and
CVS Health Corp.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of July, 2023 I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Notice of this filing will be sent to all counsel of record registered to receive electronic service by operation of the Court's electronic filing system.

/s/ James A. Brown